

Message

From: Davis, Kable [Davis.Kable@epa.gov]
Sent: 7/29/2019 8:56:01 PM
To: Goodis, Michael [Goodis.Michael@epa.gov]; Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]
Subject: FW: 24(c) Comment Document
Attachments: SLN Document for Comment 7-18-19.bp comments.sbg MLK.sbg.docx; SLN Document for Comment Incorporated Track Changes.docx

Flag: Follow up

Mike –

Here is the SLN comment document that contains all of OGC's comments. I also included a second version that incorporates all of the track changes, however leaves all of their comments so you and Rick can see them. I was hesitant to start making too many changes based on their comments, since many of the comments are changes that another attorney made. The email chain below also outlines OGC's main concerns. Below are what I feel to be the main points.

Ex. 5 Deliberative Process (DP)

I hope this helps.

Bo

From: Garrison, Scott
Sent: Thursday, July 25, 2019 11:27 AM
To: Knorr, Michele <knorr.michele@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Davis, Kable <Davis.Kable@epa.gov>
Subject: RE: 24(c) Comment Document

Confidential communication for internal deliberations only. Attorney-client privilege. Do not distribute outside EPA.

Attached a revised markup. One questions not addressed in this markup is whether Alex wanted to revise the Qs and As? If that is correct, then the Q and A in question should be added.

Scott Garrison
Pesticides and Toxic Substances Law Office (2333A)
Office of General Counsel
U.S. Environmental Protection Agency
202-564-4047

garrison.scott@epa.gov

From: Knorr, Michele
Sent: Wednesday, July 24, 2019 11:31 AM
To: Garrison, Scott <Garrison.Scott@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Davis, Kable <Davis.Kable@epa.gov>
Subject: RE: 24(c) Comment Document

I think we need to talk to Bo and see whether we need an OPP management call here.

Michele L. Knorr, Attorney
Pesticides and Toxic Substances Law Office
Office of General Counsel
202-564-5631

From: Garrison, Scott
Sent: Wednesday, July 24, 2019 11:14 AM
To: Knorr, Michele <knorr.michele@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Davis, Kable <Davis.Kable@epa.gov>
Subject: RE: 24(c) Comment Document

Confidential communication for internal deliberations only. Attorney-client privilege. Do not distribute outside EPA.

Ex. 5 AC/DP

Scott Garrison
Pesticides and Toxic Substances Law Office (2333A)
Office of General Counsel
U.S. Environmental Protection Agency
202-564-4047
garrison.scott@epa.gov

From: Knorr, Michele
Sent: Wednesday, July 24, 2019 9:55 AM
To: Koch, Erin <Koch.Erin@epa.gov>; Garrison, Scott <Garrison.Scott@epa.gov>; Davis, Kable <Davis.Kable@epa.gov>
Subject: RE: 24(c) Comment Document

Ex. 5 AC/DP

Michele L. Knorr, Attorney

ED_006409_00061734-00002

Pesticides and Toxic Substances Law Office
Office of General Counsel
202-564-5631

From: Koch, Erin
Sent: Wednesday, July 24, 2019 9:52 AM
To: Garrison, Scott <Garrison.Scott@epa.gov>; Davis, Kable <Davis.Kable@epa.gov>
Cc: Knorr, Michele <knorr.michele@epa.gov>
Subject: RE: 24(c) Comment Document

My understanding was that Alex requested the issue be put out for comment. Michele, were you at that meeting?

From: Garrison, Scott
Sent: Tuesday, July 23, 2019 4:22 PM
To: Davis, Kable <Davis.Kable@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>
Subject: RE: 24(c) Comment Document

Confidential communication for internal deliberations only. Attorney-client privilege. Do not distribute outside EPA.

Ex. 5 Deliberative Process (DP) / Attorney-Client

Scott Garrison
Pesticides and Toxic Substances Law Office (2333A)
Office of General Counsel
U.S. Environmental Protection Agency
202-564-4047
garrison.scott@epa.gov

From: Davis, Kable
Sent: Thursday, July 18, 2019 2:26 PM
To: Garrison, Scott <Garrison.Scott@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>
Subject: RE: 24(c) Comment Document

Hi Scott –

Thanks again for looking the document over. Here is a revised version that addresses your comments.

Enjoy the day.

Bo

Kable Bo Davis; Branch Chief
Minor Use & Emergency Response Branch
(703) 306-0415
davis.kable@epa.gov

From: Garrison, Scott
Sent: Wednesday, July 17, 2019 3:33 PM
To: Davis, Kable <Davis.Kable@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>
Subject: RE: 24(c) Comment Document

Confidential communication for internal deliberations only. Attorney-client privilege. Do not distribute outside EPA.

Hi Bo, my comments are attached...

Scott Garrison
Pesticides and Toxic Substances Law Office (2333A)
Office of General Counsel
U.S. Environmental Protection Agency
202-564-4047
garrison.scott@epa.gov

From: Davis, Kable
Sent: Monday, July 15, 2019 10:45 AM
To: Garrison, Scott <Garrison.Scott@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>
Subject: 24(c) Comment Document

Hi Erin and Scott –

I hope you both had a great weekend. Please find attached a revised 24(c) comment document, which is basically a complete rewrite. The document is much shorter, since it only discusses the topic of 24(c) registrations being more restrictive than the federal registration. I have a few comments:

1. Erin already looked this over (only briefly) and I made what few changes she had (added examples and discussed enforcement implications). I had mentioned that she would also have formatting comments, therefore I won't be surprised when I get comments.
2. Mike Goodis and already looked this over and I have incorporated his comments as well.
3. Mike and Rick discussed this new format and Rick was fine with it being much more streamlined.
4. Rick wants this to be passed along to Alex by the end of the month, which means we don't have a lot of time (so sorry about that). The good news is that it's only 3 pages.

I appreciate your help.

Bo

Kable Bo Davis; Branch Chief
Minor Use & Emergency Response Branch
(703) 306-0415
davis.kable@epa.gov